

1
2
3
4
5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

7 MARY L. JOHNSON, individually and on)
behalf of all others similarly situated,)

8 Plaintiff,)

9 v.)

10 MGM HOLDINGS INC.; METRO-)
11 GOLDWYN-MAYER INC.; METRO-)
12 GOLDWYN-MAYER STUDIOS INC.;)
13 METRO-GOLDWYN-MAYER HOME)
14 ENTERTAINMENT LLC; METRO-)
15 GOLDWYN-MAYER HOME)
16 ENTERTAINMENT DISTRIBUTION)
17 CORPORATION; TWENTIETH)
18 CENTURY FOX HOME)
19 ENTERTAINMENT LLC and DOES 1-10)
inclusive,)

20 Defendants.)

Case No. 2:17-cv-00541-RSM

**STIPULATION AND ORDER TO
CONTINUE CURRENT DEADLINES
PENDING MEDIATION**

21 COME NOW the parties in the above-referenced matter, by and through their attorneys
22 of record, and hereby stipulate as follows:

23 1. The parties wish to explore early settlement and resolution of this dispute before
24 expending significant attorneys' fees and court resources. To that end, they have agreed to a
25 mediator and are scheduling a mediation to occur before the end of October.

26 2. To allow time to participate in mediation and meaningful settlement discussions,
27 and to allow time for Defendants to produce reasonable discovery on an expedited basis sufficient
to facilitate meaningful settlement discussions, the parties have agreed, subject to the approval
of the Court, to continue all deadlines in this matter pending that mediation.

3. Specifically, the parties request that:

STIPULATION AND ORDER TO CONTINUE CURRENT
DEADLINES PENDING MEDIATION - 1
CASE NO. 2:17-cv-00541-RSM

130763.0001/7057731.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

- Defendants' time to respond to the First Amended Class Action Complaint be continued from August 28 to November 15, 2017;
- the deadline for the FRCP 26(a)(1) Conference be continued to December 1, 2017;
- the deadline for service of Initial Disclosures be continued to December 14, 2017; and
- the deadline for filing of the Combined Joint Status Report and Discovery Plan be extended to December 20, 2017.

STIPULATED this 25th day of August, 2017.

LANE POWELL PC

By s/John S. Devlin

John S. Devlin III, WSBA No. 23988

devlinj@lanepowell.com

1420 Fifth Avenue, Suite 4200

PO Box 91302

Seattle, WA 98111-9402

T: 206.223.7000

F: 206.223.7107

Tamerlin J. Godley (*Admitted Pro Hac*)

Samuel T. Boyd (*Admitted Pro Hac*)

MUNGER, TOLLES & OLSON LLP

350 S. Grand Avenue, 50th Floor

Los Angeles, CA 90071

T: 213.683.9100

Email: tamerlin.godley@mto.com

samuel.boyd@mto.com

Attorneys for Defendants MGM Holdings Inc.,
Metro-Goldwyn-Mayer Inc., Metro-Goldwyn-
Mayer Studios Inc., Metro-Goldwyn-Mayer Home
Entertainment LLC, Metro-Goldwyn-Mayer
Home Entertainment Distribution Corporation,
and Twentieth Century Fox Home Entertainment
LLC

EISENHOWER & CARLSON PLLC

(*Signed with permission*)

1 By s/Alexander S. Kleinberg
2 Alexander S. Kleinberg, WSBA #34449
3 1201 Pacific Ave., Suite 1200
4 Tacoma, WA 98402-4395
5 Tel: (253) 572-4500
6 Email: akleinberg@eisenhowerlaw.com

7 Alan Statman (Admitted Pro Hac)
8 Sylvie Derrien (Admitted Pro Hac)
9 Statman, Harris & Eyrich, LLC
10 3700-Carew Tower
11 441 Vine Street
12 Cincinnati, OH 45202
13 Email: ajstatman@statmanharris.com
14 sderrien@statmanharris.com

15 Attorneys for Plaintiff Mary L. Johnson

16 **ORDER**

17 This matter having come before the Court on the Parties' STIPULATION AND
18 PROPOSED ORDER TO CONTINUE CURRENT DEADLINES PENDING MEDIATION and
19 good cause having been shown,

20 IT IS SO ORDERED. Defendants' deadline to respond to Plaintiff's First Amended
21 Class Action Complaint is continued to November 15, 2017. The deadline for the FRCP 26(a)(1)
22 Conference is continued to December 1, 2017; the deadline for service of Initial Disclosures is
23 continued to December 14, 2017; and the deadline for filing of the Combined Joint Status Report
24 and Discovery Plan is continued to December 20, 2017.

25 DATED this 28th day of August, 2017.

26 

27 RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

1 Presented by:

2 LANE POWELL PC

3
4 By s/John S. Devlin

5 John S. Devlin III, WSBA No. 23988

6 devlinj@lanepowell.com

7 1420 Fifth Avenue, Suite 4200

8 PO Box 91302

9 Seattle, WA 98111-9402

10 T: 206.223.7000

11 F: 206.223.7107

12 Tamerlin J. Godley (*Admitted Pro Hac*)

13 Samuel T. Boyd (*Admitted Pro Hac*)

14 MUNGER, TOLLES & OLSON LLP

15 350 S. Grand Avenue, 50th Floor

16 Los Angeles, CA 90071

17 T: 213.683.9100

18 Email: tamerlin.godley@mto.com

19 samuel.boyd@mto.com

20 Attorneys for Defendants MGM Holdings
21 Inc., Metro-Goldwyn-Mayer Inc., Metro-
22 Goldwyn-Mayer Studios Inc., Metro-
23 Goldwyn-Mayer Home Entertainment LLC,
24 Metro-Goldwyn-Mayer Home Entertainment
25 Distribution Corporation, and Twentieth
26 Century Fox Home Entertainment LLC

27 EISENHOWER & CARLSON PLLC

(Signed with permission)

By s/Alexander S. Kleinberg

Alexander S. Kleinberg, WSBA #34449

1201 Pacific Ave., Suite 1200

Tacoma, WA 98402-4395

Tel: (253) 572-4500

Email: akleinberg@eisenhowerlaw.com

Alan Statman (*Admitted Pro Hac*)

Sylvie Derrien (*Admitted Pro Hac*)

Statman, Harris & Eyrich, LLC

3700-Carew Tower

441 Vine Street

Cincinnati, OH 45202

Email: ajstatman@statmanharris.com

sderrien@statmanharris.com

Attorneys for Plaintiff Mary L. Johnson

STIPULATION AND ORDER TO CONTINUE CURRENT
DEADLINES PENDING MEDIATION - 4
CASE NO. 2:17-cv-00541-RSM

130763.0001/7057731.1

LANE POWELL pc
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107